Institute for Community Alliances

Homeless Management Information System

POLICIES & PROCEDURES

For: Iowa Balance of State CoC

Des Moines/Polk County CoC

Sioux City/Woodbury County CoC

Omaha/Douglas County CoC

The Institute for Community Alliance

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1. INTRODUCTION

This document provides the framework for the ongoing operations of the Iowa Institute for Community Alliances Homeless Management Information System Project (IICA HMIS). The Project Overview provides the main objectives, direction and benefits of IICA HMIS. Governing Principles establishes the values that are the basis for all policy statements and subsequent decisions.

Operating Procedures provides specific policies and steps necessary to control the operational environment and enforce compliance in

- Project Participation
- User Authorization
- Collection and Entry of Client Data
- Release and Disclosure of Client Data
- Server Security
- Server Availability
- Workstation Security
- Training
- Technical Support

Other Obligations and Agreements discuss external relationships required for the continuation of this project.

2. PROJECT OVERVIEW

The long-term vision of IICA HMIS is to enhance Partner Agencies' collaboration, service delivery and data collection capabilities. Accurate information will put the various Continua of Care that IICA partners in a better position to request funding from various sources and help plan better for future needs.

The mission of the IICA HMIS Project is to be an integrated network of homeless and other service providers that use a central database to collect, track and report uniform information on client needs and services. This system will not only meet Federal requirements but also enhance service planning and delivery.

The fundamental goal of IICA HMIS is to document the demographics of homelessness in our partner Continua according to the HUD HMIS Standards. It is then the goal of the project to identify patterns in the utilization of assistance, and document the effectiveness of the services for the client. This will be

accomplished through analysis of data that is gathered from the actual experiences of homeless persons and the service providers who assist them in shelters and homeless assistance programs throughout the county. Data that is gathered via intake interviews and program participation will be used to complete HUD Annual Progress Reports. This data may also be analyzed to provide unduplicated counts and anonymous aggregate data to policy makers, services providers, advocates, and consumer representatives.

The project utilizes a web-enabled application residing on a central server to facilitate data collection by homeless service organizations across the county. Access to the central server is limited to agencies formally participating in the project and then only to authorized staff members who meet the necessary training and security requirements.

IICA HMIS is staffed and advised by The Iowa Institute for Community Alliance. The Iowa Institute for Community Alliance's Executive Director is the authorizing agent for all agreements made between Partner Agencies and The Iowa Institute for Community Alliance. The IICA HMIS System Administrators are responsible for the administration of the central server and user access. The Iowa Institute for Community Alliance Project Staff will also provide technology, training and technical assistance to users of the system throughout the continua.

Various data related Sub-Committees of the Continua are responsible for oversight and guidance of IICA HMIS. These groups are committed to balancing the interests and needs all stakeholders involved; homeless men, women, and children; service providers; and policy makers.

Potential benefits for homeless men, women, and children and case managers: Service coordination can be improved when information is shared among case management staff within one agency or with staff in other agencies (with written client consent) who are serving the same clients.

Potential benefits for agencies and program managers: Aggregated, information can be used to develop a more complete understanding of clients' needs and outcomes, and then used to advocate for additional resources, complete grant applications, conduct evaluations of program services, and report for funding agencies such as HUD.

Potential benefits for community-wide Continuums of Care and policy makers: County-wide involvement in the project provides the capacity to generate HUD Annual Progress Reports for the Continuums of Care and allows access to aggregate information both at the local and regional level that will assist in identification of gaps in services, as well as the completion of other service reports used to inform policy decisions aimed at addressing and ending homelessness at local, state and federal levels.

3. Governing Principles

Described below are the overall governing principles upon which all decisions pertaining to IICA HMIS are based.

Participants are expected to read, understand, and adhere to the spirit of these principles, even when the Policies and Procedures do not provide specific direction.

Confidentiality
The rights and privileges of clients are crucial to the success of IICA HMIS. These policies will ensure clients' privacy without impacting the delivery of services, which is the primary focus of agency programs participating in this project.

Policies regarding client data are founded on the premise that a client owns his/her own personal information and provide the necessary safeguards to protect client, agency, and policy level interests. Collection, access and disclosure of client data through IICA HMIS will only be permitted by the procedures set forth in this document.

Data Integrity
Client data is the most valuable and sensitive asset of IICA HMIS. These policies will ensure integrity and protect this asset from accidental or intentional unauthorized modification, destruction or disclosure.

System Availability

The availability of a centralized data repository is necessary to achieve the ultimate state or countywide aggregation of unduplicated homeless statistics. The System Administrator is responsible for ensuring the broadest deployment and availability for homeless service agencies across all participating Continua.

Compliance

Violation of the policies and procedures set forth in this document will have serious consequences. Any deliberate or unintentional action resulting in a breach of confidentiality or loss of data integrity will result in the withdrawal of system access for the offending entity.

4. Roles and Responsibilities

The Iowa Institute for Community Alliance

The Iowa Institute for Community Alliance Executive/Associate Director
- Liaison with HUD
- Project Staffing
- The Iowa Institute for Community Alliance Signatory for Memorandums of Understanding
- Overall Responsibility for Success of IICA HMIS

Project Manager and System Administrator
- Selection and Procurement of Server Hardware
- Hosting Facility Agreement
- Domain Registration
- Procurement of Server Software and Licenses
- End User Licenses (First 2 Years)
- Creation of Project Forms and Documentation
- Project Website
- Project Policies and Procedures and Compliance
- General Responsibility for Project Rollout

- Central Server Administration
  - Server Security, Configuration, and Availability
  - Setup and Maintenance of Hardware

- ♦ Installation and Maintenance of Software
- ♦ Configuration of Network and Security Layers
- ♦ Anti-Virus Protection for Server Configuration
- ♦ System Backup and Disaster Recovery
- Keeper of Signed Memorandums of Understanding
- User Administration
  - ♦ Add and Remove Partner Agency Technical Administrators
  - ♦ Manage User Licenses
- System Uptime and Performance Monitoring
- Ongoing Protection of Confidential Data
- Curriculum Development
- Training Documentation
- Confidentiality Training
- Application Training for Agency Administrators and End Users
- Outreach/End User Support
- Training Timetable
- Helpdesk

Data Analyst
- Adherence to HUD Data Standards
- Application Customization
- Data Monitoring
- Data Validity
- Aggregate Data Reporting and Extraction
- Assist Partner Agencies with Agency-Specific Data Collection and Reporting Needs (Within Reason and Within Constraints of Other Duties)

Partner Agency (PA)

Partner Agency Executive Director
- Authorizing Agent for Partner Agreement (Memorandum of Understanding)
- Designation of Technical Administrator
- Agency Compliance with Policies and Procedures
- End User Licenses
- Agency Level HUD Reporting
- Each Partner Agency is responsible for ensuring they meet the Privacy and Security requirements detailed in the HUD HMIS Data and Technical

Standards. Annually, Partner Agencies will conduct a thorough review of internal policies and procedures regarding HMIS.

Partner Agency Technical Administrator
- Authorizing Agent for Partner Agency User Agreements
- Keeper of Partner Agency User Agreements
- Keeper of Executed Client Informed Consent Forms
- Authorizing Agent for User ID Requests
- Staff Workstations
- Internet Connectivity
- End User Adherence to Workstation Security Policies
- Detecting and Responding to Violations of the Policies and Procedures
- First Level End User Support
- Maintain Agency/Program Data in IICA HMIS Application
- Authorized Imports of Client Data

Agency Staff
- Safeguard Client Privacy Through Compliance with Confidentiality Policies
- Data Collection as Specified by Training and Other Documentation

5. Operating Procedures
5.1 Project Participation

Policies
- Agencies participating in IICA HMIS shall commit to abide by the governing principles of IICA HMIS and adhere to the terms and conditions of this partnership as detailed in the Memorandum of Understanding

Procedures

Confirm Participation
1. The Partner Agency shall confirm their participation in IICA HMIS by submitting a Memorandum of Understanding to the IICA HMIS System Administrator.
2. The IICA HMIS System Administrator will obtain the co-signature of The Iowa Institute for Community Alliance Executive Director.

3. The IICA HMIS System Administrator will maintain a file of all signed Memorandums of Understanding.
4. The IICA HMIS System Administrator will maintain a list of all Partner Agencies

Terminate Participation

Voluntary
1. The Partner Agency shall inform the IICA HMIS System Administrator in writing of their intention to terminate their agreement to participate in IICA HMIS.
2. The IICA HMIS System Administrator will inform the The Iowa Institute for Community Alliance's Executive Director and update the Participating Agency List.
3. The IICA HMIS System Administrator will revoke access of the Partner Agency staff to IICA HMIS. Note: All Partner Agency-specific information contained in the IICA HMIS System will remain in the IICA HMIS system.
4. The IICA HMIS System Administrator will keep all termination records on file with the associated Memorandums of Understanding.

Lack of Compliance
1. When the IICA HMIS System Administrator determines that a Partner Agency is in violation of the terms of the partnership, Executive Directors of Partner Agency and IICA will work to resolve the conflict(s).
2. If the Executive Directors are unable to resolve conflict(s), the appropriate CoC Data Committee will be called upon to resolve the conflict. If that results in a ruling of Termination:
    i.   The Partner Agency will be notified in writing of the intention to terminate their participation in IICA HMIS.
    ii.   The IICA HMIS System Administrator will revoke access of the Partner Agency staff to IICA HMIS.
    iii. The IICA HMIS System Administrator will keep all termination records on file with the associated Memorandums of Understanding.

Assign Primary HMIS Administrator Contact
1. The Partner Agency shall designate a primary contact for communications regarding IICA HMIS by submitting form to the IICA HMIS System Administrator.
2. The IICA HMIS System Administrator will obtain all signatures necessary to execute the Partner Agency Technical Administrator Agreement.
3. The IICA HMIS System Administrator will maintain a file of all signed Technical Administrator Assignment forms.
4. The IICA HMIS System Administrator will maintain a list of all assigned Partner Agency Technical Administrators and make it available to the IICA HMIS staff.

Re-Assign Technical Administrator
1. The Partner Agency may designate a new or replacement primary contact in the same manner as above.

Site Security Assessment
1. Prior to allowing access to IICA HMIS, the Partner Agency Technical Administrator and the IICA HMIS System Administrator may meet to review and assess the security measures in place to protect client data. The Partner Agency Executive Director (or designee) and Partner Agency Administrator may meet with a The Iowa Institute for Community Alliance staff member to assess The Partner Agency's information security protocols. This review shall in no way reduce the responsibility for Partner Agency information security, which is the full and complete responsibility of the Partner Agency, its Executive Director, and Administrator.
2. Partner Agencies shall have virus protection software on all computers that access IICA HMIS.

5.2 *User Authorization & Passwords*

Policies
- Partner Agency staff participating in IICA HMIS shall commit to abide by the governing principles of IICA HMIS and adhere to the terms and conditions of the Partner Agency User Agreement.

- The Partner Agency Technical Administrator must only request user access to IICA HMIS for those staff members that require access to perform their job duties.
- All users must have their own unique user ID and should never use or allow use of a user ID that is not assigned to them (see Partner Agency User Agreement).
- Temporary, first time only, passwords will be communicated via email or phone to the owner of the user ID.
- User-specified passwords should never be shared and should never be communicated in any format.
- New user IDs must require password change on first use.
- Passwords must consist of at least 8 characters and must contain a combination of letters and numbers (no special characters; alpha and numeric only). The password must contain at least two numbers (required by software). According to the HUD Data and Technical Standards Final Notice (July 2004):

    User authentication. Baseline Requirement. A CHO must secure HMIS systems with, at a minimum, a user authentication system consisting of a username and password. Passwords must be at least eight characters long and meet reasonable industry standard requirements.
- Passwords must be changed every 45 days. If they are not changed within that time period they will expire and the user will be locked out of the system.
- For Partner Agency Administrators and Agency Users, passwords may only be reset by the IICA HMIS System Administrator.
- Three consecutive unsuccessful attempts to login will disable the User ID until the account is reactivated by the IICA HMIS System Administrator.
- It is the responsibility of the partnering Agency to inform The Iowa Institute for Community Alliance about any changes to IP address information previously submitted and approved for authorized access to IICA HMIS.

Procedures

Workstation Security Assessment

1. Prior to requesting user access for any staff member, the Partner Agency Administrator will assess the operational security of the user's workspace.
2. Partner Agency Administrator will confirm that workstation has virus protection properly installed and that a full-system scan has been performed within the last week.
3. Partner Agency Administrator will confirm that workstation has and uses a hardware or software firewall.

Request New User ID

1. When the Partner Agency Administrator indentifies a staff member that requires access to IICA HMIS, a "User Ethics & Responsibility Agreement" (UERA) *will* be provided to the prospective user.
2. The prospective user must read, understand and sign the *UERA* and return it to the Executive Director.
3. The Agency Executive Director will co-sign the *UERA*, retain a copy on file and return original to IICA.
4. The IICA System Administrator will create the new user ID as specified and notify the user ID owner of the temporary password via email.

Change User Access

1. When the Partner Agency Administrator determines that it is necessary to change a user's access level, the Partner Agency Technical Administrator will contact IICA who will update the user ID as needed.

Rescind User Access

Voluntary
Use this procedure when any IICA HMIS user leaves the agency or otherwise becomes inactive.

Compliance Failure:
Use this procedure when any IICA HMIS user breaches the "User Ethics & Responsibility Agreement" (UERA), or violates

the Policies and Procedures, or breaches confidentiality or security.

1. The Partner Agency Administrator will deactivate staff user IDs
2. The IICA HMIS System Administrator will deactivate all other user IDs

Reset Password
1. When a user forgets his or her password or has reason to believe that someone else has gained access to their password, they must immediately notify their Partner Agency Technical Administrator.
2. The Partner Agency Technical Administrator will reset the user's password and notify the user of the new temporary password.

5.3   Collection and Entry of Client Data

Policies

- Client data will be gathered according to the policies, procedures and confidentiality rules of each individual program.
- Client data may only be entered into IICA HMIS with client's authorization to do so.
- All universal and program data elements from the HUD IICA HMIS Data and Technical Standards Final Draft should be collected, subject to client consent.
- Client data will only be shared with Partner Agencies if the client consents, has signed the Client Consent form, and the signed Client Consent form is available on record.
- Client data will be entered into IICA HMIS in a timely manner.
    - ♦ Client identification should be completed during the intake process or as soon as possible following intake and within 24 hours.
    - ♦ Required assessments should be entered as soon as possible following the intake process and within 48 hours.

♦ If service records are recorded, IICA recommends these should be entered on the day services began or as soon as possible within the next 24 hours.

- All client data entered into IICA HMIS will be kept as accurate and as current as possible.
- Hardcopy or electronic files will continue to be maintained according to individual program requirements, and according to the HUD IICA HMIS Data and Technical Standards Final Draft.
- No data may be imported without the client's authorization.
- Any authorized data imports will be the responsibility of the Partner Agency.
- Partner Agencies are responsible for the accuracy, integrity, and security of all data input by said Agency.
- Our Continuum of Care is committed to entering client specific data into IICA HMIS that is accurate, complete, and timely to ensure quality of data, and to provide reports to agency executive management, public policy decision makers, and all participating homeless service and housing providers.
- Data quality of client specific data is essential to the meaningful analysis and accurate reporting of Continuums of Care data.
- Data quality shall be a concern of highest importance and all members of Continuums of Care will work to continuously improve quality.
- Quality assurance shall be the ultimate responsibility of each Partner's Agency's Executive Director. The Iowa Institute for Community Alliance will provide Exception Reports to the Partner Agency Technical Administrator who is designated by the Partner Agency Executive Director.
- The Partner Agency that creates a client record owns the responsibility for a baseline of data quality to include: non-duplication of client record, Release of Information (ROI), Universal & Program level data elements as defined by HUD Data Standards, up-to-date Program Entries and Exits, and answers to the questions, "Currently Homeless?" and "Chronically Homeless?".
- Each Partner Agency that comes in contact with a client has an opportunity to improve data quality and should make every effort to do so when that opportunity arises.

- Each Partner Agency has agreed to and is responsible for collecting and entering all of the data elements on Iowa Basic or MACCH Basic Intake Form, whether required by HUD or not.
- The Continuums of Care will decide on a plan to dispose of (or remove identifiers from) client data seven (7) years after it was created or last changed.

Procedures

1. Refer to User Manual and/or Training Materials for specific data entry guidelines.
2. The Iowa Institute for Community Alliance will provide each agency with an ongoing Exceptions Report, and provide the training necessary in order for the Partner Agency to be able to download and report to the appropriate parties within the agency.
3. The Partner Agency Technical Administrator will share data with authorized personnel only (those with IICA HMIS authorization).
4. Partner Agency Technical Administrator will be responsible for reviewing the weekly Exception Reports and notifying users to make corrections, within one week.
5. Partner Agency Technical Administrator will inform the IICA HMIS System Administrator if there are any technical issues retrieving the Exception Reports within three (3) business days.
6. Upon request of Partner Agency Executive Management, The Iowa Institute for Community Alliance will provide measures and metrics to verify data quality.
7. Upon request by The Continua's Executive Committee, The Iowa Institute for Community Alliance will provide measures and metrics to assess the data quality of individual programs.
8. The CoC's Data Committee shall develop with IICA the procedure to properly dispose of client data within the seven-year time frame allocated in the HUD Data Standards.

5.4 Release of Disclosure of Client Data

Policies

- Client-specific data from IICA HMIS may be shared with Partner Agencies only when the sharing agency has secured a valid Release of Information

from that client authorizing such sharing, and only during such time that Release of Information is valid (before its expiration). Other non-IICA HMIS inter-agency agreements do not cover the sharing of IICA HMIS data.

- Sharing of client data may be limited by program specific confidentiality rules.
- No client-specific data will be released or shared outside of the Partner Agencies unless the client gives specific written permission or unless withholding that information would be illegal (see Release of Information). Note that services may NOT be denied if client refuses to sign Release of Information or declines to state any information.
- Release of Information must constitute INFORMED consent. The burden rests with the intake staff to inform the client before asking for consent. As part of informed consent, a notice must be posted explaining the reasons for collecting the data, the client's rights, and any potential future uses of the data. An example of such a sign for posting may be found at www.iowainstitute.net under Forms.
- Client shall be given print out of all data relating to them upon written request and within 10 working days.
- A report of data sharing events, including dates, agencies, persons, and other details, must be made available to the client upon request and within 10 working days.
- Aggregate data that does not contain any client specific identifying data may be shared with internal and external agents without specific permission. This policy should be made clear to clients as part of the Informed Consent procedure.
- Each Partner Agency Executive Director is responsible for his or her agency's internal compliance with the HUD Data Standard.

Procedures

1. Procedures for disclosure of client-specific data are readily obtained from the above policies, combined with the configuration of IICA HMIS, which facilitates appropriate data sharing.

5.5 Server Security
Policies

- The IICA HMIS System Administrator and our HMIS Vendor will strive to secure and keep secure the servers, both physically and electronically.

Procedures

1. All procedures for maximizing Server Security are the responsibility of the IICA HMIS System Administrator and our HMIS vendor.

5.6 Server Availability

Policies

- The IICA HMIS System Administrator will strive to maintain continuous availability by design and by practice.
- Necessary and planned downtime will be scheduled when it will have least impact, for the shortest possible amount of time, and will only come after timely communication to all participants.
- The IICA HMIS System Administrator is responsible for design and implementation of a back and recovery plan (including disaster recovery).

Procedures

1. A user should immediately report unplanned downtime to his or her Partner Agency Technical Administrator.
2. All other procedures for maximizing server availability, recovering from unplanned downtime, communicating, and avoiding future downtime are the responsibility of the IICA HMIS System Administrator.
3. The IICA HMIS System Administrator or our HMIS vendor will backup system, software, and database data on a weekly basis, as well as incremental backups nightly.

5.7 Workstation Security

Policies

- The Partner Agency Technical Administrator is responsible for preventing degradation of the whole system resulting from viruses, intrusion, or other factors under the agency's control.
- The Partner Agency Technical Administrator is responsible for preventing inadvertent release of confidential client-specific information. Such release may come from physical or electronic or even visual access to the workstation, thus steps should be taken to prevent these modes of inappropriate access (that is, don't let someone read over your shoulder: lock your screen).

- All workstations to be used with IICA HMIS must be secured by a firewall between the workstation and the internet. Software firewalls are acceptable.
- Recommended Internet connection: DSL or Cable Modem, at least 128 kbits.
- Definition and communication of all procedures to all Partner Agency users for achieving proper agency workstation configuration and for protecting their access by all Agency users to the wider system are the responsibility of the Partner Agency Technical Administrator.

Procedures
1. At a minimum, any workstation accessing the central server shall have anti-virus software with current virus definitions (24 hours) and frequent full-system scans (weekly).

5.8 Training
Policies
- The Partner Agency Executive Director shall obtain the commitment of the Partner Agency Technical Administrator and designated staff persons to attend training(s) as specified in the *Memorandum of Understanding (MOU)* between Partner Agency and The Iowa Institute for Community Alliance.

Procedures
Start-up Training
The Iowa Institute for Community Alliance will provide training in the following areas prior to the Partner Agency using IICA HMIS:
   o Partner Agency Administrator training
   o End User training
   o Confidentiality training

Partner Agency Technical Administrator Training
Training will be done in a group setting, where possible to achieve the most efficient use of time and sharing of information between agencies. Training will include:
   o New user set-up
   o Assigning agency within IICA HMIS hierarchy
   o End User training
   o Running package reports

o   Creating customized reports

5.9 Compliance

Policies

- Compliance with these Policies and Procedures is mandatory for participation in IICA HMIS.
- Using the Servicepoint software, all changes to client data are recorded and will be periodically and randomly audited for compliance.
- Each Partner Agency is responsible for ensuring they meet the Privacy and Security requirements detailed in the HUD HMIS Data and Technical Standards. Annually, Partner Agencies will conduct a thorough review of internal policies and procedures regarding IICA HMIS.

Procedures

1. See "Project Participation" and "User Authorization" sections for procedures to be taken for lack of compliance.

5.10 Technical Support

Policies

- Support requests include problem reporting, requests for enhancements (features), or other general technical support.
- Users shall submit support requests to their Partner Agency Technical Administrator (email is suggested).
- Users shall not, under any circumstances, submit requests to software vendor.
- Users shall not submit requests directly to The Iowa Institute for Community Alliance without specific invitation. All requests to The Iowa Institute for Community Alliance shall be submitted to Partner Agency Technical Administrator, who may then escalate to The Iowa Institute for Community Alliance, who may then escalate to vendors as appropriate.
- The Iowa Institute for Community Alliance will only provide support for issues specific to IICA HMIS software and systems.

Procedures

Submission of Support Request

1. User encounters problem or originates idea for improvement to system or software.
2. User creates support request via email sent to Partner Agency Technical Administrator specifying the severity of the problem and its impact on their work, specific steps to reproduce the problem, and any other documentation that might facilitate the resolution of the problem. User shall also provide contact information and best times to contact.
3. The Partner Agency Administrator, upon receipt of a support request, shall make reasonable attempts to resolve the issue.
4. *If the Partner Agency Administrator is unable to resolve the issue and determines that the problem is specific to IICA HMIS software and systems, the Partner Agency Administrator shall consolidate multiple similar requests and submit to IICA.   Note: If the Support Request is deemed by IICA HMIS System Administrator to be an agency-specific customization[1], resolution of the request may be prioritized accordingly. IICA reserves the right to charge on an hourly basis for these changes if/when the workload for such agency-specific customizations becomes burdensome.*
5. The IICA HMIS System Administrator may at this point determine that the cause of reported issue is outside the scope of control of the IICA HMIS software and systems.
6. The IICA HMIS System Administrator will consolidate such requests from multiple Partner Agencies, if appropriate, and strive to resolve issues according to their severity and impact.
7. If the IICA HMIS System Administrator is unable to resolve the issue, other software or system vendor(s) may be included in order to resolve the issue(s).
8. In cases where issue resolution may be achieved by the end user or other Partner Agency personnel, the IICA HMIS System Administrator will provide instructions via email to the Partner Agency Administrator.

5.11 Changes to This and Other Documents

Policies

- The Data Committee of the Continua will guide the compilation and amendment of these Policies and Procedures.

Procedures

Changes to Policies & Procedures

1. Proposed changes may originate from any participant in IICA HMIS.
2. When proposed changes originate within a Partner Agency, they must be reviewed by the Partner Agency Executive Director, and then submitted by the Partner Agency Executive Director to the IICA HMIS System Administrator for review and discussion.
3. IICA HMIS System Administrator will maintain a list of proposed changes.
4. The list of proposed changes will be discussed by the Technology Committee, subject to line item excision and modification. This discussion may occur either at a meeting of the Technology Committee, or via email or conference call, according to the discretion and direction of the Technology Committee Chairperson.
5. Results of said discussion will be communicated, along with the amended Policies and Procedures. The revised Policies and Procedures will be identified within the document by the date of the Technology Committee discussion.
6. Partner Agencies Executive Directors shall acknowledge receipt and acceptance of the revised Policies and Procedures within 10 working days of delivery of the amended Policies and Procedures by notification in writing or email to IICA HMIS System Administrator. The Partner Agency Executive Director shall also ensure circulation of the revised document within their agency and compliance with the revised Policies and Procedures.

6 Other Obligations and Agreements

Certain HUD grants for IICA HMIS projects provide for a limited number of user licenses within various Continua. While it may not be possible to meet every agency's full requirements for licenses within the HUD grant to The Iowa Institute for Community Alliance, the IICA HMIS System Administrator will endeavor to ensure that every agency

participating in Continua with these designated funds, will have their minimum requirements met from the HUD grant as long as these funds are available.

6.1   HUD HMIS Data and Technical Standards

This document should, at a minimum, reflect the baseline requirements listed in the HMIS Data and Technical Standards Final Notice, published by HUD in July 2004, and revised in 2010. Users of IICA HMIS are required to read and comply with the HMIS Data and Technical Standards. Failure to comply with these standards carries the same consequences as does failure to comply with these Policies and Procedures. In any instance where these Policies and Procedures are not consistent with the IICA HMIS Standards from HUD, the HUD Standards take precedence. Should any inconsistencies be identified, notice should be made to deberbach@iowainstitute.net.

6.2 HIPAA

For agencies or programs where HIPAA applies, HIPAA requirements take precedence over both the HUD IICA HMIS Data Requirements (as specified in those requirements) and these policies and procedures.